

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jody - Ann Campbell

(full name of the plaintiff or petitioner applying (each person must submit a separate application))

-against-

CV () ()

(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

Columbia University School of Professional Studies

Columbia University Office of the President

(full name(s) of the defendant(s)/respondent(s))

APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS

I am a plaintiff/petitioner in this case and declare that I am unable to pay the costs of these proceedings and I believe that I am entitled to the relief requested in this action. In support of this application to proceed *in forma pauperis* (IFP) (without prepaying fees or costs), I declare that the responses below are true:

1. Are you incarcerated? ☐ Yes ☒ No (If "No," go to Question 2.)

I am being held at: N/A

Do you receive any payment from this institution? ☐ Yes ☒ No

Monthly amount: N/A

If I am a prisoner, *see* 28 U.S.C. § 1915(h), I have attached to this document a "Prisoner Authorization" directing the facility where I am incarcerated to deduct the filing fee from my account in installments and to send to the Court certified copies of my account statements for the past six months. *See* 28 U.S.C. § 1915(a)(2), (b). I understand that this means that I will be required to pay the full filing fee.

2. Are you presently employed? ☐ Yes ☒ No

If "yes," my employer's name and address are:

Gross monthly pay or wages: N/A

If "no," what was your last date of employment? 07/11

Gross monthly wages at the time: 1,200

3. In addition to your income stated above (which you should not repeat here), have you or anyone else living at the same residence as you received more than \$200 in the past 12 months from any of the following sources? Check all that apply.

(a) Business, profession, or other self-employment

☐ Yes

☒ No

(b) Rent payments, interest, or dividends

☐ Yes

☒ No

- | | | |
|---|------------------------------|--|
| (c) Pension, annuity, or life insurance payments | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (d) Disability or worker's compensation payments | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (e) Gifts or inheritances | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (f) Any other public benefits (unemployment, social security, food stamps, veteran's, etc.) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (g) Any other sources | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

N/A

If you answered "No" to all of the questions above, explain how you are paying your expenses:

I am not paying my bills, I am in debt. I am homeless and squatting with an associate of mine.

4. How much money do you have in cash or in a checking, savings, or inmate account?

0

5. Do you own any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value, including any item of value held in someone else's name? If so, describe the property and its approximate value:

N/A

6. Do you have any housing, transportation, utilities, or loan payments, or other regular monthly expenses? If so, describe and provide the amount of the monthly expense:

Credit card debt - \$150

7. List all people who are dependent on you for support, your relationship with each person, and how much you contribute to their support (only provide initials for minors under 18):

N/A

8. Do you have any debts or financial obligations not described above? If so, describe the amounts owed and to whom they are payable:

Medical Debt - \$6,500. Payable to Einstein Healthcare Network.

Declaration: I declare under penalty of perjury that the above information is true. I understand that a false statement may result in a dismissal of my claims.

09/27/2022

Dated

Campbell, Jody - Ann, T

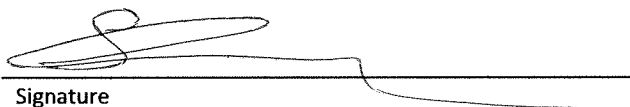
Name (Last, First, MI)

502 Janeway Dr Apt.74

Address

6105057528

Telephone Number



Signature

N/A

Prison Identification # (if incarcerated)

Norristown

City

PA

State

19401

Zip Code

jodyanntamesha@gmail.com

E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jody - Ann Campbell

Write the full name of each plaintiff.

____ CV ____

(Include case number if one has been
assigned)

-against-

Columbia University School of Professional Studies

COMPLAINT

Columbia University Office of the President

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ **Federal Question**
- ☒ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?
Title VI of the Civil Rights Act of 1964

Equal Educational Opportunities Act of 1974

1st Amendment - Freedom of Speech

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Jody - Ann Campbell, is a citizen of the State of
(Plaintiff's name)

Pennsylvania

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

N/A

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, N/A, is a citizen of the State of
(Defendant's name)

N/A

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

N/A

If the defendant is a corporation:

The defendant, Columbia University, is incorporated under the laws of
the State of New York

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) N/A

and has its principal place of business in N/A

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

<u>Jody - Ann</u>	<u>T</u>	<u>Campbell</u>
First Name	Middle Initial	Last Name
<u>502 Janeway Dr Apt.74</u>		
Street Address		
<u>Montgomery County, Norristown</u>	<u>PA</u>	<u>19401</u>
County, City	State	Zip Code
<u>6105057528</u>	<u>jodyanntamesha@gmail.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Columbia University</td> <td style="width: 50%;">School of Professional Studies</td> </tr> <tr> <td>First Name</td> <td>Last Name</td> </tr> <tr> <td colspan="2">N/A</td> </tr> <tr> <td colspan="2">Current Job Title (or other identifying information)</td> </tr> <tr> <td colspan="2">203 Lewisohn Hall, 2970 Broadway, MC 4119</td> </tr> <tr> <td colspan="2">Current Work Address (or other address where defendant may be served)</td> </tr> <tr> <td>New York County, New York</td> <td>NY</td> <td>10027</td> </tr> <tr> <td>County, City</td> <td>State</td> <td>Zip Code</td> </tr> </table>	Columbia University	School of Professional Studies	First Name	Last Name	N/A		Current Job Title (or other identifying information)		203 Lewisohn Hall, 2970 Broadway, MC 4119		Current Work Address (or other address where defendant may be served)		New York County, New York	NY	10027	County, City	State	Zip Code
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County, City	State	Zip Code																	
Defendant 2:	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Columbia University</td> <td style="width: 50%;">Office of the President</td> </tr> <tr> <td>First Name</td> <td>Last Name</td> </tr> <tr> <td colspan="2">N/A</td> </tr> <tr> <td colspan="2">Current Job Title (or other identifying information)</td> </tr> <tr> <td colspan="2">202 Low Library, 535 W. 116 St., MC 4309</td> </tr> <tr> <td colspan="2">Current Work Address (or other address where defendant may be served)</td> </tr> <tr> <td>New York County, New York</td> <td>NY</td> <td>10027</td> </tr> <tr> <td>County, City</td> <td>State</td> <td>Zip Code</td> </tr> </table>	Columbia University	Office of the President	First Name	Last Name	N/A		Current Job Title (or other identifying information)		202 Low Library, 535 W. 116 St., MC 4309		Current Work Address (or other address where defendant may be served)		New York County, New York	NY	10027	County, City	State	Zip Code
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Defendant 3:	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">N/A</td> <td style="width: 50%;">N/A</td> </tr> <tr> <td>First Name</td> <td>Last Name</td> </tr> <tr> <td colspan="2">N/A</td> </tr> <tr> <td colspan="2">Current Job Title (or other identifying information)</td> </tr> <tr> <td colspan="2">N/A</td> </tr> <tr> <td colspan="2">Current Work Address (or other address where defendant may be served)</td> </tr> <tr> <td>N/A</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>County, City</td> <td>State</td> <td>Zip Code</td> </tr> </table>	N/A	N/A	First Name	Last Name	N/A		Current Job Title (or other identifying information)		N/A		Current Work Address (or other address where defendant may be served)		N/A	N/A	N/A	County, City	State	Zip Code
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N/A	N/A	N/A																	
County, City	State	Zip Code																	

Defendant 4:	N/A		
	First Name	Last Name	
	N/A		
	Current Job Title (or other identifying information)		
	N/A		
	Current Work Address (or other address where defendant may be served)		
	N/A		
	County, City	State	Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: **Columbia University School of Professional Studies**

Date(s) of occurrence: 03/18/2022 - present

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Please refer to documents attached.

[illegible]

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

State briefly what money damages or other relief you want the court to order.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.


Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

09/27/2022

Dated

Jody - Ann

T



Plaintiff's Signature

Campbell

First Name

Middle Initial

Last Name

502 Janeway Dr Apt.74

Street Address

Montgomery County, Norristown

PA

19401

County, City

State

Zip Code

6105057528

jodyanntamesha@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Jody - Ann Campbell v. Columbia University School of Professional Studies and
Columbia University Office of the President

Campbell, Jody - Ann, T

Name (Last, First, MI)

502 Janeway Dr Apt. 74

Norristown

PA

19401

Address

City

State

Zip Code

6105057528

jodyanntamesha@gmail.com

Telephone Number

E-mail Address

09/27/2022

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007

Jody - Ann Campbell v. Columbia University

I am filing a personal injury lawsuit against the Columbia University School of Professional Studies and the Columbia University Office of the President in the City of New York. My reasons are for the **intentional infliction of emotional distress** due to the violation of my 1st Amendment right to free speech, the Title VI of the Civil Rights Act of 1964, the Equal Educational Opportunities Act of 1974, the New York Consumer Protection Law (breach of contract/false advertisement), the grossfull neglect of student finances and need, reckless endangerment, dishonorable fellowship distribution practices, and neglecting to identify and correct a corrupt financial aid office.

Case Facts

I applied to the Negotiation and Conflict Resolution program at the Columbia University School of Professional Studies in the City of New York through what was advertised as the Impact HBCU Fellowship. The Impact HBCU Fellowship advertised its qualifications as a “Current HBCU senior or recent graduate (Bachelor’s degree requirements completed Fall 2021 or later)” Those were the only qualifications for the HBCU Fellowship, along with an institutional nomination which has since been removed. This means that I qualified for the fellowship as soon as I applied, however, when I got admitted into my Masters program, I was simultaneously denied from the fellowship. According to their website and the qualifications they posted, my admissions to the fellowship should have been simultaneous with my admission to my Masters program and hence my claim to **false advertisement**.

It is important to note that I am a member of Alpha Kappa Alpha Sorority Incorporated, and I was initiated with a group of girls, one of whom was a recent graduate of The Impact HBCU Fellowship at the Columbia University School of Professional Studies. Her name is Niare Galvez. Niare Galvez was also my classmate, and we both graduated from the Lincoln University of Pennsylvania, but she left a semester before me in the Spring of 2021. I have had close contact with Niare during her time at Lincoln and we had similar interests that ultimately led us to join the same sisterhood. She was named an Impact HBCU Fellow in 2021, and the whole university and sorority was proud of her. Lincoln University is a small school in rural Pennsylvania, so news got around fast. Everyone knew who I was, just as much as everyone knew who she was. When I was denied the fellowship, knowing that we had a similar

background and she had gotten it the year prior, and everyone knew I applied, I fell into a deep depression. I was overcome with emotional distress.

My HBCU application was complete. I double checked, triple checked and even asked for a confirmation email. I even sent in an extra recommendation letter. I believe that I was wrongfully denied the fellowship because my 1st Amendment right to free speech was violated, due to an abuse of power and pride, and I was also discriminated against because I am a Jamaican immigrant, which is a violation of the Title VI of the Civil Rights Act of 1964, and the Equal Educational Opportunities Act of 1974. I emailed the HBCU Fellowship in March, asking for a clarification on the decision date release because I had another option. They ultimately gave me a decision on my program, which was an acceptance, but the decision on the fellowship was reflective of the nuance of not having the ability of free speech and to bow down to the fellowship advisor and have certain reverence or respect for the fellowship that was simply dishonorable. They wanted to shut me up and deny me my rights and the ability to contribute or participate in the fellowship and the activities therein and so that is what they did. They believed I couldn't and shouldn't have another option and so they denied me my rights.

Furthermore, the head of the Impact HBCU Fellowship read my application and decided that she wanted me to die. While I was writing my essays for the fellowship application I explicitly said that this fellowship was the only way I could afford Columbia. I also admitted to the fact that my parents suffered from mental health issues that weren't disclosed and could have been hereditary. She read my application and saw that this fellowship was the only way I could afford Columbia, she read that my parents suffered from mental health issues, and she knew I would have been accepted into the Negotiation and Conflict Resolution Program with absolutely no way to pay. Considering the suicide rates of young adults in today's era, that is reckless endangerment.

To my dismay, I didn't even have to worry about suicidal thoughts because due to my emotional distress, my health started to decline. As I stated before, my sorority sister got the fellowship the year before and my university and sorority community heard all about it. When I was denied the fellowship, I couldn't even face people to tell them the news. I was hurt, embarrassed, and suffered from anxiety so I isolated myself and didn't even attend my graduation ceremony. The

hurt and embarrassment that ensued from missing the culmination of all of my years of hard work by walking across the commencement stage landed me in the emergency room. My graduation date was May 15th, and my crippling anxiety caused me to miss it. I landed in the emergency room on May 16th, and almost bled to death due to hormonal imbalances as a result of high stress. I don't have health insurance. I need continuing health care treatments, psychological counseling, and I believe I may have developed mysophobia due to my medical debt rendering me homeless.

However, with all of this going on, nothing could have prepared me for the response from financial aid. On the Columbia University School of Professional Studies website, under the heading that gleams Financial Aid and Scholarships, it states, "The School of Professional Studies is aimed at retaining quality students and assisting them financially to achieve their academic and professional goals during their time in graduate school. At SPS, scholarships are awarded based on several criteria including academic achievement, professional promise, leadership qualities, financial need, or a combination of theses. Awards often reflect the school's commitment to achieving a diverse and talented student body." This is another case of false advertisement. I have exceeded the limits in every threshold imaginable at my age, and the reason behind that can be explained in another correspondence. I will focus on the fact that I received \$0 from the financial aid office while assuming the most need according to the Free Application for Federal Student Aid (FAFSA). Considering the fact that if anyone from the Columbia University School of Professional Studies got any amount of money surpassing the \$0 I was awarded, when I was deemed to have the most need, that is simply the grossfull neglect of student finances and need. The fact that this was able to happen under the radar and wouldn't have been caught had I not fallen into unprecedented circumstances, Dean Eggers neglected to identify and correct a corrupt financial aid office.

I emailed the Dean of The Columbia University School of Professional studies on March 21st, which was 3 days after I was denied the fellowship, and he declined to respond for several months. I also emailed him on August 25th at 6:58 pm and intended to settle, but he did not respond. I also emailed the president and provost of Columbia University and they declined to respond.

